

**FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

GLOBAL EXPEDITION VEHICLES,
LLC,

Plaintiff,

v.

LOROAD, LLC, and
RODNEY LOUGH JR.,

Defendants/Third Party Plaintiffs,

v.

MICHAEL VAN PELT and
RENE VAN PELT,

Third Party Defendants.

Case No. 6:15-cv-03296-MDH

JOINT STATUS REPORT REGARDING DISCOVERY

This Court's Scheduling and Trial Order directed the parties to submit periodic reports advising the Court of the status of discovery. The parties are to include a description of all discovery completed, all discovery scheduled but not completed, all discovery identified as necessary but not yet scheduled, and all discovery disputes.

All Completed Discovery

The initial discovery phase of the present litigation has been completed. Pursuant to the Court's Order, the parties are currently entitled to seek discovery only with respect to Global Expedition Vehicles, LLC's ("GXV") claim for violation of Missouri's Trade Secrets Act, and each party's claim for punitive damages. In that regard, the party's have deposed former GXV employee Matthew DeWeerd, GXV propounded upon Defendants its Third Requests for Production of Documents and First Interrogatories, to which Defendants have produced documents and/or answers.

Discovery scheduled but not completed

Defendants have propounded their 8th and 9th Requests for Production of Documents, and their First Interrogatories. GXV provided answers and objections to said discovery, but a dispute regarding said answers and objections remains pending. No other discovery has been scheduled at this time.

Discovery identified as necessary but not completed.

Defendants have indicated they intend to depose GXV's expert witness, Eric Housman. The parties have not yet identified any other discovery as necessary, but each party reserves the right to identify additional discovery it deems necessary as a result of further investigation.

All Discovery Disputes

A dispute currently exists regarding GXV's answers and objections to Defendants 8th Request for Production of Documents, 9th Request for Production of Documents, and First Interrogatories.

Extension of Discovery Deadline

The Parties have agreed to extend the current deadline for discovery to August 15, 2017. The parties have agreed that the following deadlines will be extended:

- The deadline for all pretrial discovery of May 1, 2017 shall be extended to August 15, 2017;
- The deadline for discovery motions of May 1, 2017 shall be extended to August 15, 2017; and
- The deadline for business records of May 1, 2017 shall be extended to August 15, 2017.

Respectfully submitted,

CARNAHAN, EVANS, CANTWELL
& BROWN, P.C.

By /s/ Jay Preston

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 3rd day of May, 2017, the foregoing was filed with the Court via electronic means and served upon the attorney(s) of record listed below, via electronic means. A copy of the document containing an original signature is kept in the file.

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/s/ Jay Preston
Attorney of Record

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